**RECEIVED**
CENTRAL FAX CENTER ☑001

**JUL 2 0 2006**

# IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

| | | | |
|---|---|---|---|
| Appellant: | Alejandro Wiechers | Examiner: | Te Y Chen |
| Serial No.: | 09/747,219 | Group Art Unit: | 2161 |
| Filed: | December 18, 2000 | Docket No.: | 10001310-1 |
| Title: | NETWORK ASSEMBLY AND METHOD FOR INSERTING AN IDENTIFICATION CODE | | |

## APPEAL BRIEF UNDER 37 C.F.R. § 41.37

**Mail Stop Appeal Brief – Patents**
Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

Dear Sir/Madam:

This Appeal Brief is submitted in support of the Notice of Appeal filed May 23, 2006, appealing the rejection of claims 1, 3, 4, 7-9, 11, 12, 14, and 21-26 of the above-identified application as set forth in the Final Office Action mailed February 27, 2006.

The U.S. Patent and Trademark Office is hereby authorized to charge **Deposit Account No. 08-2025** in the amount of **$500.00** for filing a Brief in Support of an Appeal as set forth under 37 C.F.R. § 41.20(b)(2). At any time during the pendency of this application, please charge any required fees or credit any overpayment to Deposit Account No. 08-2025.

Appellant respectfully requests reconsideration and reversal of the Examiner's rejection of pending claims 1, 3, 4, 7-9, 11, 12, 14 and 21-26.

**Appeal Brief to the Board of Patent Appeals and Interferences
of the United States Patent and Trademark Office**
Appellant: Alejandro Wiechers
Serial No.: 09/747,219
Filed: December 18, 2000
Docket No.: 10001310-1
Title: NETWORK ASSEMBLY AND METHOD FOR INSERTING AN IDENTIFICATION CODE

## TABLE OF CONTENTS

2

Appeal Brief to the Board of Patent Appeals and Interferences
of the United States Patent and Trademark Office
Appellant: Alejandro Wiechers
Serial No.: 09/747,219
Filed: December 18, 2000
Docket No.: 10001310-1
Title: NETWORK ASSEMBLY AND METHOD FOR INSERTING AN IDENTIFICATION CODE

## REAL PARTY IN INTEREST

The real party in interest is Hewlett-Packard Development Company, LP having a principal place of business at 20555 S.H. 249 Houston, TX 77070, U.S.A. (hereinafter "HPDC"). HPDC is a Texas limited partnership and is a wholly-owned affiliate of Hewlett-Packard Company, a Delaware corporation, headquartered in Palo Alto, CA. The general or managing partner of HPDC is HPQ Holdings, LLC.

## RELATED APPEALS AND INTERFERENCES

Appellant submits that there are no related appeals or interferences which will directly affect or be directly affected by or have a bearing on the decision in the pending appeal.

## STATUS OF CLAIMS

Claims 1, 3, 4, 7-9, 11, 12, 14, and 21-26 are pending in the application (see Claims Appendix), and are the subject of the present Appeal.

Claims 1, 3-4, 7-8, 21-22, and 25 are rejected under 35 U.S.C. 102(e) as being anticipated by Seder et al. US Patent No. 6,522,770.

Claims 9, 11-12, 14, 23-24, and 26 are rejected under 35 U.S.C. 103(a) as being unpatentable over Seder et al. US Patent No. 6,522,770 in view of Van Huben et al. US Patent No. 6,327,594.

## STATUS OF AMENDMENTS

No amendments have been entered subsequent to the Final Office Action mailed February 27, 2006. The claims listed in the Claims Appendix, therefore, reflect the claims as of February 27, 2006.

## SUMMARY OF THE CLAIMED SUBJECT MATTER

One aspect of the present invention, as claimed in independent claim 1, provides a system for coding an electronic file. The system includes a reference repository (33), wherein the reference repository receives the electronic file and characteristic information associated with the electronic file from a communications network (20) and stores the characteristic information in a memory; an indexing unit (100') linked with the reference

3

repository, wherein the indexing unit assigns a classification code to the electronic file based on the characteristic information, assigns an inventory code to the electronic file based on whether the electronic file already exists in the system, and compiles an identification code for the electronic file from the classification code and the inventory code; and an editing unit (200') linked with the reference repository and the indexing unit, wherein the editing unit inserts the identification code to the electronic file (see, e.g., Specification at page 4, line 29 - page 7, line 12; Figs. 1 and 2).

One aspect of the present invention, as claimed in independent claim 9, provides a system for coding an electronic file for a library. The system includes a reference repository (33) associated with the library, wherein the reference repository receives the electronic file and characteristic information associated with the electronic file from a communications network (20) and stores the characteristic information in a memory; an indexing unit (100') linked with the reference repository, wherein the indexing unit assigns a library-specific classification code to the electronic file based on the characteristic information and procedures of the library, assigns a library-specific inventory code to the electronic file based on whether the electronic file already exists in the library, and compiles a library-specific identification code for the electronic file from the library-specific classification code and the library-specific inventory code; and an editing unit (200') linked with the reference repository and the indexing unit, wherein the editing unit inserts the library-specific identification code to the electronic file (see, e.g., Specification at page 4, line 29 - page 7, line 12; Figs. 1 and 2).

One aspect of the present invention, as claimed in independent claim 21, provides a computer-implemented method for coding an electronic file. The method includes receiving an electronic file and characteristic information associated with the electronic file from a communications network (20), and storing the characteristic information in a memory; assigning a classification code to the electronic file based on the characteristic information; assigning an inventory code to the electronic file based on whether the electronic file is a copy of an existing electronic file; compiling an identification code for the electronic file from the classification code and the inventory code; and inserting the identification code to the electronic file (see, e.g., Specification at page 6, line 4 - page 9, line 2; Figs. 1-4).

4

Appeal Brief to the Board of Patent Appeals and Interferences
of the United States Patent and Trademark Office
Appellant: Alejandro Wiechers
Serial No.: 09/747,219
Filed: December 18, 2000
Docket No.: 10001310-1
Title: NETWORK ASSEMBLY AND METHOD FOR INSERTING AN IDENTIFICATION CODE

One aspect of the present invention, as claimed in independent claim 23, provides a computer-implemented method for coding an electronic file for a library. The method includes receiving an electronic file and characteristic information associated with the electronic file from a communications network (20), and storing the characteristic information in a memory; assigning a library-specific classification code to the electronic file based on the characteristic information and procedures of the library; assigning a library-specific inventory code to the electronic file based on whether the electronic file is already in the library; compiling a library-specific identification code for the electronic file from the library-specific classification code and the library-specific inventory code; and inserting the library-specific identification code to the electronic file (see, e.g., Specification at page 6, line 4 - page 9, line 2; Figs. 1-4).

## GROUNDS OF REJECTION TO BE REVIEWED ON APPEAL

Appellant seeks review of the rejection of claims 1, 3-4, 7-8, 21-22, and 25 under 35 U.S.C. 102(e) as being anticipated by Seder et al. US Patent No. 6,522,770.

Appellant seeks review of the rejection of claims 9, 11-12, 14, 23-24, and 26 under 35 U.S.C. 103(a) as being unpatentable over Seder et al. US Patent No. 6,522,770 in view of Van Huben et al. US Patent No. 6,327,594.

## ARGUMENT

### I. Rejection Under 35 U.S.C. §102

#### A. Applicable Law

To anticipate a claim under 35 U.S.C. 102, a reference must teach every element of the claim. *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987) ("A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference").

#### B. Rejection of claims 1, 3-4, 7-8, 21-22, and 25 under 35 U.S.C. §102(e)

Because the Seder et al. U.S. Patent No. 6,522,770 fails to teach each and every element of the claims, the rejection of claims 1, 3-4, 7-8, 21-22, and 25 under 35 U.S.C. 102(e) is not correct and should be withdrawn.

5

Independent claim 1 is directed to a system for encoding an electronic file and includes an indexing unit which "assigns a classification code to the electronic file based on the characteristic information, assigns an inventory code to the electronic file based on whether the electronic file already exists in the system, and compiles an identification code for the electronic file from the classification code and the inventory code," and includes an editing unit which "inserts the identification code to the electronic file."

Independent claim 21 is directed to a computer-implemented method for coding an electronic file and includes "assigning a classification code to the electronic file based on the characteristic information, assigning an inventory code to the electronic file based on whether the electronic file is a copy of an existing electronic file, compiling an identification code for the electronic file from the classification code and the inventory code, and inserting the identification code to the electronic file."

Independent claims 1 and 21, therefore, each assign a classification code to the electronic file based on the characteristic information, assign an inventory code to the electronic file based on whether the electronic file already exists in the system, and compile an identification code for the electronic file from the classification code and the inventory code, and insert the identification code to the electronic file.

The Seder et al. patent is directed to printing documents and other objects with machine readable indicia, such as steganographic digital watermarks or barcodes, wherein the indicia is added to the document at the time of printing, and wherein by showing the printed document to a computer device with a suitable optical input device, an electronic version of the document can be recalled for editing (see Abstract; col. 2, lines 12-19). As such, the Seder et al. patent is directed to coding a printed document. Independent claims 1 and 21 of the present invention, however, are directed to coding an electronic file. The Seder et al. patent, however, does not teach or suggest coding an electronic file. More specifically, the Seder et al. patent does not teach or suggest assigning a classification code to an electronic file based on characteristic information associated with the electronic file, does not teach or suggest assigning an inventory code to the electronic file based on whether the electronic file already exists in the system, does not teach or suggest compiling an identification code for the electronic file from the classification code and the inventory code, and does not teach or suggest inserting the identification code to the electronic file.

6

Appeal Brief to the Board of Patent Appeals and Interferences
of the United States Patent and Trademark Office
Appellant: Alejandro Wiechers
Serial No.: 09/747,219
Filed: December 18, 2000
Docket No.: 10001310-1
Title: NETWORK ASSEMBLY AND METHOD FOR INSERTING AN IDENTIFICATION CODE

For at least the reasons set forth above, Appellant submits that the Seder et al. patent does not teach or suggest each and every element of independent claims 1 and 21. Accordingly, Appellant submits that independent claims 1 and 21 are each patentably distinct from the Seder et al. patent. Furthermore, as dependent claims 3-4, 7-8, and 25 further define patentably distinct claim 1, and dependent claim 22 further defines patentably distinct claim 21, Appellant submits that these dependent claims are also patentably distinct from the Seder et al. patent. Appellant, therefore, respectfully submits that the rejection of claims 1, 3-4, 7-8, 21-22, and 25 under 35 U.S.C. 102(e) is not correct and should be withdrawn, and that claims 1, 3-4, 7-8, 21-22, and 25 should be allowed.

## II. Rejection Under 35 U.S.C. §103

### A. Applicable Law

Under 35 U.S.C. §103, the Examiner has the burden to establish a *prima facie* case of obviousness. *In re Fine*, 837 F.2d 1071, 1074, 5 USPQ2d 1596, 1598 (Fed. Cir. 1988). Three criteria must be satisfied to establish a *prima facie* case of obviousness. First, the Examiner must show that some objective teaching in the prior art or some knowledge generally available to one of ordinary skill in the art would teach, suggest, or motivate one to modify a reference or to combine the teachings of multiple references. *Id.* Second, the prior art can be modified or combined only so long as there is a reasonable expectation of success. *In re Merck & Co., Inc.*, 800 F.2d 1091, 231 USPQ 375 (Fed. Cir. 1986). Third, the prior art reference or combined prior art references must teach or suggest all of the claim limitations. *In re Royka*, 490 F.2d 981, 180 USPQ 580 (CCPA 1974). These three criteria are also set forth in M.P.E.P §706.02(j). Even when obviousness is based on a single reference, there must be a showing of suggestion or motivation to modify the teachings of that reference. *In re Kotzab*, 55 USPQ2d 1313, 1317 (Fed. Cir. 2000). In performing the obviousness inquiry under 35 U.S.C. §103, the Examiner must avoid hindsight. *In re Bond*, 910 F.2d 831, 834, 15 USPQ2d 1566, 1568 (Fed. Cir. 1990), *reh'g denied*, 1990 U.S. App. LEXIS 19971 (Fed. Cir. 1990).

### B. Rejection of claims 9, 11-12, 14, 23-24, and 26 under 35 U.S.C. §103(a)

Because the rejection of claims 9, 11-12, 14, 23-24, and 26 under 35 U.S.C. 103(a) as being unpatentable over Seder et al. US Patent No. 6,522,770 in view of Van Huben et al. US

7

Appeal Brief to the Board of Patent Appeals and Interferences
of the United States Patent and Trademark Office
Appellant: Alejandro Wiechers
Serial No.: 09/747,219
Filed: December 18, 2000
Docket No.: 10001310-1
Title: NETWORK ASSEMBLY AND METHOD FOR INSERTING AN IDENTIFICATION CODE

Patent No. 6,327,594 fails to establish a *prima facie* case of obviousness, the rejection of claims 9, 11-12, 14, 23-24, and 26 is not correct and should be withdrawn.

**Independent claim 9** is directed to a system for coding an electronic file for a library and includes an indexing unit which "assigns a library-specific classification code to the electronic file based on the characteristic information and procedures of the library, assigns a library-specific inventory code to the electronic file based on whether the electronic file already exists in the library, and compiles a library-specific identification code for the electronic file from the library-specific classification code and the library-specific inventory code," and includes an editing unit which "inserts the library-specific identification code to the electronic file."

**Independent claim 23** is directed to a computer-implemented method for coding an electronic file for a library and includes "assigning a library-specific classification code to the electronic file based on the characteristic information and procedures of the library, assigning a library-specific inventory code to the electronic file based on whether the electronic file is already in the library, compiling a library-specific identification code for the electronic file from the library-specific classification code and the library-specific inventory code, and inserting the library-specific identification code to the electronic file."

Independent claims 9 and 23, therefore, each assign a library-specific classification code to the electronic file based on the characteristic information and procedures of the library, assign a library-specific inventory code to the electronic file based on whether the electronic file already exists in the library, and compile a library-specific identification code for the electronic file from the library-specific classification code and the library-specific inventory code, and insert the library-specific identification code to the electronic file.

The Examiner contends that the Seder et al. patent discloses an electronic document coding system comprising a reference repository, an indexing unit linked with the reference repository for assigning an identification code to the electronic file based on the associated characteristic data, and an editing unit linked with the reference repository and the indexing unit (Final Office Action, page 5-6). The Examiner recognizes, however, that the Seder et al. patent does not disclose that the software encoding procedures are library-specific (Final Office Action, page 6). Accordingly, the Examiner contends that the Van Huben et al. patent discloses software procedures that are library-specific (Final Office Action, page 6). As such,

8

**Appeal Brief to the Board of Patent Appeals and Interferences**
**of the United States Patent and Trademark Office**
Appellant: Alejandro Wiechers
Serial No.: 09/747,219
Filed: December 18, 2000
Docket No.: 10001310-1
Title: NETWORK ASSEMBLY AND METHOD FOR INSERTING AN IDENTIFICATION CODE

the Examiner suggests that with the teachings of Seder and Van Huben in front of him/her, an ordinary skilled artisan at the time the invention was made would be motivated to apply Van Huben library specific-procedures to modify Seder's system (Final Office Action, page 7).

As outlined above, Appellant submits that the Seder et al. patent does not teach or suggest coding an electronic file and, more specifically does not teach or suggest assigning a classification code to an electronic file based on characteristic information associated with the electronic file, does not teach or suggest assigning an inventory code to the electronic file based on whether the electronic file already exists in the system, does not teach or suggest compiling an identification code for the electronic file from the classification code and the inventory code, and does not teach or suggest inserting the identification code to the electronic file.

Regarding the Van Huben et al. patent, the Van Huben et al. patent is related to the management of disparate forms of data generated, captured, transmitted, or otherwise manipulated by pervasive computing devices (see Abstract). The Van Huben et al. patent, however, does not teach or suggest a library-specific classification code, a library-specific inventory code, nor a library-specific identification code. As such, the Van Huben et al. patent does not overcome the shortcomings of the Seder et al. patent.

Accordingly, Appellant submits that modifying the Seder et al. patent in view of the Van Huben et al. patent, in the manner suggested by the Examiner, does not teach or suggest all of the limitations of the present claims. To establish *prima facie* obviousness of a claimed invention, all the claim limitations must be taught or suggested by the prior art. *In re Royka*, 490 F.2d 981, 180 USPQ 580 (CCPA 1974).

In view of the above, Appellant submits that the Examiner has not established a *prima facie* case of obviousness of independent claims 9 and 23, and that independent claims 9 and 23 are each patentably distinct from the Seder et al. and Van Huben et al. patents. As dependent claims 11-12, 14, and 26 further define patentably distinct claim 9, and dependent claim 24 further defines patentably distinct claim 23, Appellant submits that these dependent claims are also patentably distinct from the Seder et al. and Van Huben et al. patents. Appellant, therefore, respectfully submits that the rejection of claims 9, 11-12, 14, 23-24, and 26 under 35 U.S.C. §103(a) is not correct and should be withdrawn, and that claims 9, 11-12, 14, 23-24, and 26 should be allowed.

Appeal Brief to the Board of Patent Appeals and Interferences
of the United States Patent and Trademark Office
Appellant: Alejandro Wiechers
Serial No.: 09/747,219
Filed: December 18, 2000
Docket No.: 10001310-1
Title: NETWORK ASSEMBLY AND METHOD FOR INSERTING AN IDENTIFICATION CODE

## CONCLUSION

For the above reasons, Appellant respectfully submits that the art of record neither anticipates nor renders obvious the claimed invention. Thus, the claimed invention does patentably distinguish over the art of record. Appellant, therefore, respectfully submits that the above rejections are not correct and should be withdrawn, and respectfully requests that the Examiner be reversed and that all pending claims be allowed.

Any inquiry regarding this Appeal Brief should be directed to either Nathan Rieth at Telephone No. (208) 396-5287, Facsimile No. (208) 396-3958 or Scott A. Lund at Telephone No. (612) 573-2006, Facsimile No. (612) 573-2005. In addition, all correspondence should continue to be directed to the following address:

IP Administration
Legal Department, M/S 35
HEWLETT-PACKARD COMPANY
P.O. Box 272400
Fort Collins, Colorado 80527-2400

Respectfully submitted,

Alejandro Wiechers,

By,

DICKE, BILLIG & CZAJA, PLLC
Fifth Street Towers, Suite 2250
100 South Fifth Street
Minneapolis, MN 55402
Telephone: (612) 573-2006
Facsimile: (612) 573-2005

Date: _____          _____

SAL:hsf                                 Scott A. Lund
                                        Reg. No. 41,166

CERTIFICATE UNDER 37 C.F.R. 1.8: The undersigned hereby certifies that this paper or papers, as described herein, are being facsimile transmitted to the United States Patent and Trademark Office, Fax No. (571) 273-8300 on this _____ day of July, 2006.

By_____
Name: Scott A. Lund

10

Appeal Brief to the Board of Patent Appeals and Interferences
of the United States Patent and Trademark Office
Appellant: Alejandro Wiechers
Serial No.: 09/747,219
Filed: December 18, 2000
Docket No.: 10001310-1
Title: NETWORK ASSEMBLY AND METHOD FOR INSERTING AN IDENTIFICATION CODE

## CLAIMS APPENDIX

1.    (Previously Presented)   A system for coding an electronic file, comprising:

a reference repository, wherein the reference repository receives the electronic file and characteristic information associated with the electronic file from a communications network and stores the characteristic information in a memory;

an indexing unit linked with the reference repository, wherein the indexing unit assigns a classification code to the electronic file based on the characteristic information, assigns an inventory code to the electronic file based on whether the electronic file already exists in the system, and compiles an identification code for the electronic file from the classification code and the inventory code; and

an editing unit linked with the reference repository and the indexing unit, wherein the editing unit inserts the identification code to the electronic file.

2.    (Canceled)

3.    (Previously Presented)  The system according to claim 1 wherein the communications network comprises the Internet.

4.    (Previously Presented)  The system according to claim 1 wherein the electronic file comprises published material.

5.    (Canceled)

6.    (Canceled)

7.    (Previously Presented)  The system according to claim 1 wherein the indexing unit assigns the identification code to the electronic file with respect to the characteristic information.

8.    (Previously Presented)  The system according to claim 1 wherein the indexing unit

11

**Appeal Brief to the Board of Patent Appeals and Interferences**
**of the United States Patent and Trademark Office**
Appellant: Alejandro Wiechers
Serial No.: 09/747,219
Filed: December 18, 2000
Docket No.: 10001310-1
Title: NETWORK ASSEMBLY AND METHOD FOR INSERTING AN IDENTIFICATION CODE

stores the identification code with respect to the characteristic information.

9.  (Previously Presented)  A system for coding an electronic file for a library, comprising:

a reference repository associated with the library, wherein the reference repository receives the electronic file and characteristic information associated with the electronic file from a communications network and stores the characteristic information in a memory;

an indexing unit linked with the reference repository, wherein the indexing unit assigns a library-specific classification code to the electronic file based on the characteristic information and procedures of the library, assigns a library-specific inventory code to the electronic file based on whether the electronic file already exists in the library, and compiles a library-specific identification code for the electronic file from the library-specific classification code and the library-specific inventory code; and

an editing unit linked with the reference repository and the indexing unit, wherein the editing unit inserts the library-specific identification code to the electronic file.

10.  (Canceled)

11.  (Previously Presented)  The system according to claim 9 wherein the editing unit formats the library-specific identification code as authorized by the library.

12.  (Previously Presented)  The system according to claim 11 further comprising a review unit linked with the indexing unit, wherein the review unit facilitates review of the formatted electronic file.

13.  (Canceled)

14.  (Previously Presented)  The system according to claim 12 wherein the review unit dispatches the formatted electronic file to a book on demand machine.

15-20.  (Canceled)

12

21. (Previously Presented) A computer-implemented method for coding an electronic file, comprising:

receiving an electronic file and characteristic information associated with the electronic file from a communications network, and storing the characteristic information in a memory;

assigning a classification code to the electronic file based on the characteristic information;

assigning an inventory code to the electronic file based on whether the electronic file is a copy of an existing electronic file;

compiling an identification code for the electronic file from the classification code and the inventory code; and

inserting the identification code to the electronic file.

22. (Previously Presented) The computer-implemented method according to claim 21 wherein the electronic file represents a publication, and wherein the characteristic information includes at least one of a title, an author, a publisher, a format, a copyright, an International Standard Book Number (ISBN), and a number of pages of the publication.

23. (Previously Presented) A computer-implemented method for coding an electronic file for a library, comprising:

receiving an electronic file and characteristic information associated with the electronic file from a communications network, and storing the characteristic information in a memory;

assigning a library-specific classification code to the electronic file based on the characteristic information and procedures of the library;

assigning a library-specific inventory code to the electronic file based on whether the electronic file is already in the library;

compiling a library-specific identification code for the electronic file from the library-specific classification code and the library-specific inventory code; and

inserting the library-specific identification code to the electronic file.

24.    (Previously Presented)  The computer-implemented method according to claim 23 wherein the electronic file represents a publication, and wherein the characteristic information includes at least one of a title, an author, a publisher, a format, a copyright, an International Standard Book Number (ISBN), and a number of pages of the publication.

25.    (Previously Presented)  The system according to claim 1 wherein the electronic file represents a publication, and wherein the characteristic information includes at least one of a title, an author, a publisher, a format, a copyright, an International Standard Book Number (ISBN), and a number of pages of the publication.

26.    (Previously Presented)  The system according to claim 9 wherein the electronic file represents a publication, and wherein the characteristic information includes at least one of a title, an author, a publisher, a format, a copyright, an International Standard Book Number (ISBN), and a number of pages of the publication.

14

**Appeal Brief to the Board of Patent Appeals and Interferences**
**of the United States Patent and Trademark Office**
Appellant: Alejandro Wiechers
Serial No.: 09/747,219
Filed: December 18, 2000
Docket No.: 10001310-1
Title: NETWORK ASSEMBLY AND METHOD FOR INSERTING AN IDENTIFICATION CODE

## EVIDENCE APPENDIX

None.

**THIS PAGE BLANK (USPTO)**

15

Appeal Brief to the Board of Patent Appeals and Interferences
of the United States Patent and Trademark Office
Appellant: Alejandro Wiechers
Serial No.: 09/747,219
Filed: December 18, 2000
Docket No.: 10001310-1
Title: NETWORK ASSEMBLY AND METHOD FOR INSERTING AN IDENTIFICATION CODE

## RELATED PROCEEDINGS APPENDIX

None.

# THIS PAGE BLANK (USPTO)

16